

April 30, 2024

VIA ECF

Hon. Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Vernita Worrell v. Nature Deli Corp. et al.*, Docket No. 1:23-cv-10456-AT

Dear Judge Torres:

We represent Defendant Turbo 228 Livingston Street LLC in the referenced action. We write pursuant to Rule I(C) of Your Honor's Individual Practices in Civil Cases and with Plaintiff's counsel's consent to respectfully request a second extension of time for Turbo 228 Livingston Street LLC to answer, move, or otherwise respond to Plaintiff's Amended Complaint to May 22, 2024. We additionally request, with Plaintiff's consent, a brief extension of time to submit a Case Management Plan and Joint Letter from May 15, 2024 to June 5, 2024.

As previously detailed, Plaintiff's Complaint alleges that barriers to accessibility exist at a place of public accommodation. Turbo 228 Livingston Street LLC is the owner of the premises at issue and co-defendant Nature Deli Corp. is the tenant. We require time to coordinate with co-defendant Nature Deli Corp. who has not yet appeared in this action.

This letter motion is Defendant Turbo 228 Livingston Street LLC's second request for an extension of time to respond to the Complaint and to submit a Case Management Plan and Joint Letter.

We thank the Court for its time and consideration.

GRANTED.

SO ORDERED.

Dated: May 1, 2024  
New York, New York

  
\_\_\_\_\_  
ANALISA TORRES  
United States District Judge